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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

TS-OPTICS CORPORATION,

Plaintiff,

v.

MICROSOFT CORPORATION,

Defendant.

Case No. 8:24-cv-01974-DOC-DFM

**JOINT MOTION TO STAY ALL
DEADLINES AND NOTICE OF
SETTLEMENT**

1 Plaintiff TS-Optics Corporation (“TS-Optics”) and Defendant Microsoft
2 Corporation (“Defendant”) (collectively, the “Parties”) file this Joint Motion to Stay
3 All Deadlines and Notice of Settlement and provide as follows:
4

5 1. The Parties hereby notify the Court that all matters in controversy
6 between the Parties have been settled in principle, and request the Court stay all
7 unreached deadlines for three (3) weeks so that the Parties can finalize and execute
8 a long-form settlement agreement.
9

10 2. In furtherance of the agreement in principle, the Parties expect to file
11 dismissal papers within the next three (3) weeks.
12

13 3. A stay in this matter would conserve the resources of the Parties and
14 Court and ensure that the proceedings in this litigation do not compromise or
15 interfere with the Parties’ efforts to finalize the settlement.
16

17 4. This motion is not being made for the purpose of delay, but rather is
18 made in the interest of justice, to limit expenses, and preserve judicial resources.
19

20 **RELIEF REQUESTED**

21 The Parties respectfully request that the Court enter a stay of all deadlines for
22 3 weeks in the form of the proposed order submitted concurrently with this Motion.
23

24 DATED: September 30, 2025

Respectfully submitted,

25 /s/ Benjamin T. Wang
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SIGNATURE CERTIFICATION

I hereby certify that the consent of this document is acceptable to Andrew V. Devkar, counsel for Defendant Microsoft Corporation, and that I have obtained Mr. Devkar's authorization to affix his electronic signature to this document.

DATED: September 30, 2025

/s/ Benjamin T. Wang

Benjamin T. Wang

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Civil Rule 5-3.3 and 5.4.

Dated: September 30, 2025

/s/ Benjamin T. Wang

Benjamin T. Wang